



October 29, 2024

VIA ECF

The Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Rapaport v. Iyer, et al.*, No. 1:23-cv-06709 (JGLC)
Defendants Iyer & Garrett's Motion for Leave to File Consolidated
Reply in Support of Motion to Dismiss and Opposition to
Plaintiff's Motion for Leave to File Second Amended Complaint

Dear Judge Clarke:

Defendants Ajay Iyer and Zachary Garrett respectfully request leave to file a consolidated reply in support of motion to dismiss and opposition to motion for leave to file a second amended complaint. Defendants maintain that a consolidated filing will be more efficient, as they must address many overlapping issues in these filings. For instance, in their motion to dismiss reply, Defendants will explain why the claims in the first amended complaint must be dismissed as untimely. And, in responding to Plaintiff's request for leave to file another amended complaint, Defendants will explain why the proposed amendments do not cure this defect. Filing a consolidated response will reduce redundancy.

Additionally, Defendants request leave to file a consolidated reply and opposition of no more than 30 pages. Under the applicable rules, Defendants may file a 10-page reply and a 25-page opposition. Thus, a consolidated 30-page response will reduce the total number of pages filed.

In advance of filing this request, undersigned counsel requested Plaintiff's position on two occasions—once at 10:40 a.m. on October 28 and a second time at 8:30 a.m. on October 29. To date, the undersigned has not received a response from Plaintiff. In light of the upcoming filing deadline, Defendants file this request without waiting further for Plaintiff's position.

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Honorable Jessica G.L. Clarke
October 29, 2024
Page 2

Respectfully,

/s/ Brian J. Field

Brian J. Field

SCHAERR | JAFFE LLP

Counsel for Defendants

Ajay Iyer and Zachary Garrett

cc: *Pro se* Plaintiff (via ECF)
All counsel (via ECF)